

MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

Plaintiffs' Executive Committee for Personal Injury and Death Claims	Plaintiffs' Executive Committee for Commercial Claims
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Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Robert T. Haefele, <i>Co-Liaison Counsel</i> MOTLEY RICE LLC	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

March 31, 2022

BY ECF

The Honorable Sarah Netburn
United States Magistrate Judge
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Judge Netburn,

Earlier today we notified defendants Kingdom of Saudi Arabia and Dallah Avco that one of plaintiffs' experts, Steven Simon, has had emergency medical complications and has requested an additional week to complete his report. Plaintiffs can provide further details under seal if necessary. Mr. Simon nonetheless anticipates being able to serve his report by Friday, April 8, 2022.

Counsel for the Kingdom of Saudi Arabia and counsel for Dallah Avco have consented to this request. As per a request from Dallah Avco which is also filing an expert report tomorrow, plaintiffs have agreed not to share or discuss the Dallah Avco report with Mr. Simon until after his report is served on April 8, 2022. Plaintiffs expect to serve all other expert reports tomorrow.

Accordingly, we respectfully request a one-week extension to serve Mr. Simon's report.

Respectfully submitted,
KREINDLER & KREINDLER

/s/ Andrew J Maloney
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The Honorable Sarah Netburn
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For the MDL 1570 Plaintiffs' Exec.
Committee for Personal Injury and Death
Claims

COZEN O'CONNOR

MOTLEY RICE

/s/ Sean P. Carter

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For the MDL 1570 Plaintiffs' Exec.
Committee for Commercial Claims

/s/ Robert T. Haefele

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For the MDL 1570
Plaintiffs' Exec. Committee for Personal
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